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15 *Springs Partners, LLC, Tropical Sands, LLC*  
16 *and Rhodes Ranch, LLC*

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4 *Trustee of the Dynasty Trust I, John C.*  
5 *Rhodes, Trustee of the Dynasty Trust II,*  
6 *Gypsum Resources, LLC, and Truckee*  
7 *Springs Holdings, Inc.*

13 **UNITED STATES BANKRUPTCY COURT**

14 **DISTRICT OF NEVADA**

15 In re  
16 THE RHODES COMPANIES, LLC, aka  
17 "Rhodes Homes," *et al.*,  
18 Reorganized Debtors.

19 Case No. 09-14814-LBR  
20 (Jointly Administered)

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1 THE LITIGATION TRUST OF THE RHODES  
2 COMPANIES, LLC, ET AL.,

3 Plaintiff,

4 v.

5 JAMES M. RHODES, SEDORA HOLDINGS,  
6 LLC, SAGEBRUSH ENTERPRISES, INC.,  
7 GYPSUM RESOURCES, LLC, TRUCKEE  
8 SPRINGS HOLDINGS, INC., JOHN C.  
9 RHODES, JOHN C. RHODES, TRUSTEE OF  
10 THE JAMES M. RHODES DYNASTY TRUST  
11 I, JOHN C. RHODES, TRUSTEE OF THE  
12 JAMES M. RHODES DYNASTY TRUST II,  
13 HARMONY HOMES, INC., NORTH 5, LLC,  
14 FARM HUALAPAI, LLC, HARMONY 2,  
15 LLC, HAYDEN SPRINGS PARTNERS, LLC,  
16 TROPICAL SANDS, LLC, and RHODES  
17 RANCH, LLC,

18 Defendants.

19 Adversary Proceeding No. 12-01099-LBR

20 **NOTICE OF DEFENDANT'S MOTION  
FOR WITHDRAWAL OF REFERENCE**

21 Complaint filed: May 11, 2012

22 **RELIEF IS SOUGHT FROM A UNITED  
STATES DISTRICT JUDGE IN  
COMPLIANCE WITH LR 5011**

23 **PLEASE TAKE NOTICE** that Sagebrush Enterprises, Inc., Harmony Homes, Inc., North 5<sup>th</sup>,  
24 LLC, Farm Hualapai, LLC, Harmony2, LLC, Hayden Springs Partners, LLC, Tropical Sands, LLC and  
25 Rhodes Ranch, LLC, John C. Rhodes, John C. Rhodes, Trustee of the Dynasty Trust I, John C. Rhodes,  
26 Trustee of the Dynasty Trust II, Gypsum Resources, LLC and Truckee Springs Holdings, Inc.  
(collectively, the "**Movants**"), through counsel, filed Movants' Motion for Withdrawal of Reference  
27 (the "**Motion**") with the United States Bankruptcy Court for the District of Nevada (the "**Bankruptcy  
Court**") on June 29, 2012.

28 **YOUR RIGHTS MAY BE AFFECTED.** You should read this Notice, as well as the  
Motion, and discuss them with your attorney, if you have one in this bankruptcy case. If you do  
not have an attorney, you may wish to consult one.

29 In the Motion, the Movants seek to withdraw the reference of the above-entitled proceeding  
30 from Bankruptcy Court and to have the matter heard in the United States District Court for the District  
31 of Nevada.

32 If you do not want the court to grant the relief requested in the Motion, or if you want the court  
33 to consider your views on the Motion, you *must* file a **WRITTEN** response to the Motion with the court

1 within fourteen (14) days after the Motion was served. You *must* also serve your written response on  
2 the person who sent you this notice. Specifically, LR 5011 provides as follows:

3 Opposing parties must file with the clerk of the bankruptcy court, and serve on all  
4 parties to the withdrawal of the reference matter, their written opposition to the motion  
5 to withdraw the reference within fourteen (14) days after the motion is served.

6 If you do not file a written response with the court, or if you do not serve your written response  
7 on the person who sent you this notice, the court may decide that you do not oppose the relief sought in  
8 the Motion and may enter an order granting such relief. Specifically, the court may *refuse to allow you*  
9 *to speak* at any hearing scheduled on the Motion or *rule against you* without formally calling the matter  
10 for hearing.

11 Dated this 29th day of June 2012.

12 JIMMERSON HANSEN, P.C.

13 By: /s/ James Jimmerson, Esq.  
14 JAMES JIMMERSON, ESQ.  
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18 *Counsel for Sagebrush Enterprises, Inc., Harmony  
19 Homes, Inc., North 5<sup>th</sup>, LLC, Farm Hualapai, LLC,  
20 Harmony2, LLC, Hayden Springs Partners, LLC,  
21 Tropical Sands, LLC and Rhodes Ranch, LLC*

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23 By: /s/ William H. Heaton, Esq.  
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29 *Counsel for John C. Rhodes, John C. Rhodes, Trustee  
30 of the Dynasty Trust I, John C. Rhodes, Trustee of the  
31 Dynasty Trust II, Gypsum Resources, LLC, Truckee  
32 Springs Holdings, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 29th day of June, 2012, I caused the foregoing document to be filed electronically via the electronic filing system of the United States Bankruptcy Court for the District of Nevada, which caused a true and correct copy of the foregoing to thereafter be served electronically via the Bankruptcy Court's ECF noticing system upon those parties registered to receive electronic service in this case.

/s/ Maureen E. Marella  
Maureen E. Marella - Employee of  
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